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October 11, 2010

To whom it may concern,

We are seeking reassessment (class II permissive change) approval of the DigiTrak transmitters using FCC ID KKG0624192 applying to part 15.209 of FCC rules. We would like to specify a range of 12-19.2 kHz on the grant. This change is requested due to the addition of models: 5XD 12/1.3, 5XD 19/12 and 5X 18.5. They are underground low frequency magnetic transmitters used for purposes of guiding a horizontal directional drill operation.

The 5XD 12/1.3 model operates in "single mode" at 12 kHz or in "dual mode" at both 1.3 kHz and 12 kHz. The 5XD 19/12 model operates on either 12 kHz or 19.2 kHz. The 5X 18.5 model transmitter operates at a fixed 18.5 kHz.

The 5XD 12/1.3 model, 5XD 19/12 model, and 5X 18.5 model of transmitters are electrically and mechanically identical to the FX model using FCC ID KKGFX and the FX 19.2 model using FCC ID KKG0624192. The method, equipment, and materials used in the manufacture are also the same, as well as the power requirement, power output, and modulations. The devices operate on different frequencies as determined by the software. The Northwest EMC test reports DIGC0070 for the FX transmitter and DIGC0107 for the FX 19.2 transmitter should be sufficient to show compliance is maintained across the specified range since the hardware and power consumption for the devices have not changed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rudy Zeller', is written over the 'Sincerely,' text.

Rudy Zeller
Digital Control Inc.
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Kent WA, 98032